

2018 DEC 10 PM 2:12

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

In the Matter of Application of)	
)	
Hall Communications, Inc.)	File No. BNPFT-20181012AAS
)	Facility ID No. 15959
For Original Construction for New)	
FM Translator at West Warwick, RI)	

Accepted / Filed

To: Office of the Secretary
 Attention: Chief, Audio Division, Media Bureau

DEC - 6 2018

Federal Communications Commission
Office of the Secretary

REPLY TO OPPOSITION AND OPPOSITION TO AMENDMENT

Townsquare Media New Bedford License, LLC ("Townsquare"), by its attorneys and pursuant to Sections 73.5006 and 74.1204(f) of the Commission's rules, hereby submits this Reply to the November 20, 2018 "Opposition to Petition to Deny" ("Opposition") filed by Hall Communications, Inc. ("Hall") in connection with the above-captioned application ("Application") for construction permit for a new FM broadcast translator station at West Warwick, Rhode Island, to operate on Channel 296D (107.1 MHz) ("Translator"). Concurrent with its Opposition, Hall amended the Application. The Application as so amended is referred to herein as the "Amended Application."

In its Petition, Townsquare explained that Hall's Application should be dismissed because the proposed Translator would cause interference to the reception Townsquare's station WFHN by established listeners within the Translator's 60 dBμ contour. The Petition demonstrated that Townsquare's objection satisfied the four-part test employed by the Commission to determine whether prohibited predicated interference under 74.1204(f) of the

Commission's rules is present.¹ The Technical Statement filed with Townsquare's Petition included complaints of potential interference from several WFHN listeners, provided contact information for these listeners, and included a map of the areas where the listeners expect to suffer interference from the proposed Translator, included within the Translator's predicated 60 dBμ contour. These facts remain uncontroverted.

In an attempt to overcome the predicted interference to WFHN listeners, Hall amended its Application to "reduce power and substitute a directional antenna for its previously proposed nondirectional antenna."² The Amended Application fails to obviate the predicted interference to WFHN listeners. In light of the Amended Application and the newly proposed contour, attached is a second Technical Report from Martin Stabbert, Vice President of Engineering at Townsquare Media Inc. ("Technical Statement II"). Technical Statement II demonstrates the existence of nine WFHN listeners at fixed locations within the amended 60 dBu contour who would be expected to receive interference to their reception WFHN as a result of Hall's Translator.³ Contact information for these listeners is set forth in Technical Statement II, along with a map of the areas where the listeners will suffer interference from the proposed Translator.

Contrary to Hall's assertion, Section 74.1204(f) applies with equal force to the Amended Application as it did to the initial Application. Under the Commission's four-part test to determine the existence of prohibited predicated interference, the Commission will dismiss an

¹ *Association for Community Education, Inc., Memorandum Opinion and Order*, 19 FCC Rcd 12682, 12685-6 (2004) (establishing a test for determining whether prohibited predicted interference is present).

² Opposition at 2.

³ Moreover, Townsquare also received declarations from several listeners who work in sales and assert that they listen to WFHN as they drive throughout the Translator's proposed (amended) 60 dBu contour.

FM translator application if an opponent to such an application provides: (1) the name and specific address of each affected listener; (2) a demonstration that the address falls within the 60 dBμ contour of the proposed translator; (3) a declaration from each listener verifying that he/she listens to the full-power station at such location; and (4) evidence that grant of the authorization will result in interference to the reception of the “desired” station at that location.⁴

As demonstrated in Technical Statement II, each of the attached declarations meets that four-criteria test with regard to Hall’s amended contour. Accordingly, because grant of the Amended Application would result in interference from the Translator to listeners of Townsquare’s full power station WFHN, the Amended Application cannot be granted.

⁴ *Association for Community Education, Inc., Memorandum Opinion and Order*, 19 FCC Rcd 12682, 12685-6 (2004) (establishing a test for determining whether prohibited predicted interference is present).

CONCLUSION

In light of the foregoing, Townsquare respectfully requests that the Audio Division dismiss the captioned Application, as amended.

Respectfully submitted,

TOWNSQUARE MEDIA NEW BEDFORD
LICENSE, LLC

By: Howard M. Liberman

Howard M. Liberman
Erin M. Griffith
Wilkinson Barker Knauer, LLP
1800 M Street, NW - Suite 800N
Washington, DC 20036
202-783-4141

Its Attorneys

December 6, 2018

DECLARATION

I, Christopher Kitchen, Executive Vice President and General Counsel to Townsquare Media, Inc., parent of Townsquare Media New Bedford License, LLC, hereby declare under penalty of perjury that I have reviewed the attached Reply to Opposition and Opposition to Amendment, and that its contents are true and correct to the best of my knowledge, information, and belief.

Signed and dated this 6th day of December 2018.

A handwritten signature in black ink, consisting of a stylized 'C' followed by a horizontal line and a 'K', with a long horizontal stroke extending to the right.

Christopher Kitchen

Technical Exhibit
Licensed FM Station WFHN - Fairhaven, MA
Proposed FM Translator Station FCC Facility ID 202750 - West Warwick, RI

This technical exhibit has been prepared on behalf of Townsquare Media New Bedford License, LLC, licensee of FM station WFHN(FM) on channel 296A at Fairhaven, MA, in regard to amended construction permit application BNPFT-20181012AAS for new FM translator station Facility ID 202750 on channel 296D at West Warwick, RI. The specific purpose of this technical exhibit is to present evidence that the activation of Facility 202750 as proposed in BNPFT-20181012AAS (as amended) will cause harmful interference to regular listeners of WFHN at their places of work and while mobile in the vicinity of Providence, RI.

Section 74.1204(f) of the FCC Rules states that an application for an FM translator station will not be accepted for filing “...if the predicted 1 mV/m field strength contour of the FM translator station will overlap a populated area already receiving a regularly used, off-the-air signal of any authorized co-channel, first, second or third adjacent channel broadcast station....” (Emphasis added.) Our analysis indicates that regular WFHN listeners work and travel within the predicted 1mV/m contour of the facility proposed by BNPFT-20181012AAS. As such, the application is defective on its face and must be dismissed.

Attached hereto are declarations from ten (10) regular WFHN listeners who will be subjected to interference from the proposed facility within the predicted 1mV/m contour. For purposes of visualization, the listener locations were identified by geographic coordinates and plotted on the attached map. Each location was also analyzed to calculate the U/D signal ratio of the proposed translator and WFHN. For the proposed co-channel facility to not interfere with WFHN, the U/D ratios must be -20dB or lower (more negative). The calculations reveal egregious interference to WFHN will exist at all declarant locations, with U/D ratios failing to meet the -20dB target value by a minimum of 36dB and a maximum of 53dB. These results are tabulated below:

Listener Location	Translator Signal (50,10 Undesired)	WFHN Signal (50,50 Desired)	U/D Ratio (-20dB required)	Failure Margin
Eddy Street	72.5dBu	44.1dBu	+28.4dB	48.4dB
Peace Street	67.4dBu	44.0dBu	+23.4dB	43.4dB
Carolina Avenue	69.4dBu	45.3dBu	+24.1dB	44.1dB
Dudley Street	77.2dBu	44.2dBu	+33.0dB	53.0dB
Bold Point Park	60.5dBu	44.5dBu	+16.0dB	36.0dB

The map and all calculations presented in this technical exhibit were created using RadioSoft ComStudy and prepared directly by the undersigned on behalf of Townsquare Media New Bedford License, LLC. The information contained within is true to the best of his knowledge and belief.

A handwritten signature in black ink, appearing to read "Martin Stabbert". The signature is fluid and cursive, with a large initial "M" and a stylized "S".

Martin Stabbert
Certified Professional Broadcast Engineer
Vice President of Engineering
Townsquare Media, Inc.

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information: Sheena Paulinio, 1047 Bowles Street, New Bedford, MA 02745. (508) 509-7844
svassal09@gmail.com.

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible. Home address (listed above)....I listen on my way to and from work at Rhode Island Hospital, 593 Eddy Street, Providence, RI. I listen on 195 East and West all the way into Providence from New Bedford and back again. I listen on 95 North and South to Eddy Street.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations? As mentioned above, I listen to and from work on Eddy Street in Providence and traveling about. I listen at various hours.

How often do you listen at the above locations and traveling on the routes given above? 5 days a week at those Providence, Rhode Island locations.

Do you personally know any one that works at the radio station? If yes what is your relationship to them? No.

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above? Yes

What is your preferred contact method? Please give Mail, email or phone contact information. Email.
svassal09@gmail.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven ,MA and the above information is correct to the best of my knowledge.

Signed:

Sheena M Paulinio

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

Karina Santos. 401-340-5610 43 Royler St. Cranston. RI. 02920

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

To and from work 4 times a week (and when traveling on 95 N + South) to Rhode Island Hospital. 593 Eddy Street Providence RI.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations?

As mentioned above various hours of the day

How often do you listen at the above locations and traveling on the routes given above?

3-4 times a week

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

No

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

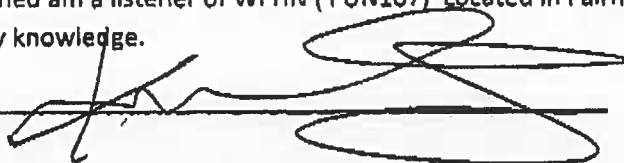
Yes

What is your preferred contact method? Please give Mail, email or phone contact information.

Email - Ksantos84@Live.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven ,MA and the above information is correct to the best of my knowledge.

Signed: _____



FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

Emily Weibel 774-201-9333 265 Williamson Drive. Somerset. 02726

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

To and from work every day (address above) to Rhode Island Hospital 593 Eddy Street Providence, RI. I listen on 195 East + West in Providence and back to Somerset as well as 95 North + South onto Eddy Street

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while travelling? For example driving between what two locations?

As mentioned above various hours starting at 1pm to after noon.

How often do you listen at the above locations and traveling on the routes given above?

5 days a week at those providence RI locations

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

NO!

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

Yes

What is your preferred contact method? Please give Mail, email or phone contact information.

Email Emily.Kitchen@me.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven, MA and the above information is correct to the best of my knowledge.

Signed: _____



FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

Mike Chase, 375 Oak Hill Ave, Seekonk, MA 02771 Phone: (401) 228-5777. Email: Mikechase209@gmail.com

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the **addresses** of those locations if possible.

I only listen to the radio when I'm in my vehicles. So, I listen to Fun 107 in Providence, India Point, that whole area. I kayak at Bold Point Park, and we go and we bring out a little radio and listen to Fun 107 on the water, too.

Do you listen while traveling to and from work or just traveling about? On what **roads** do you listen while traveling? For example driving between what two locations?

I leave from Seekonk each day, and about 95% of my work is in Rhode Island. I listen to Fun 107 until I get to South County when it cuts out.

But each day, I am listening on 195 East and West in Providence, over the India Point Bridge. I'll listen on 95 North and South in Providence. I'm all around that area all day. I've been listening to Fun 107 for years.

How often do you listen at the above locations and traveling on the routes given above? 5 days a week. In the morning and in the afternoon.

Do you personally know any one that works at the radio station? If yes what is your relationship to them? No, I do not.

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above? Yes, absolutely.

What is your preferred contact method? Please give Mail, email or phone contact information. Email would be best. Mikechase209@gmail.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven ,MA and the above information is correct to the best of my knowledge.



Signed: _____

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information: Stacey Pacheco, 233 Jefferson Street, Fall River, MA 02721 (774) 319-0737.

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible. Home, I listen to Abby's traffic updates to find out if I need to take an alternate route to work. I listen each morning while I'm traveling on 195 West to 95 North, then I take exit 1 (Point Street). We listen at work which the YMCA of Greater Providence. The address is 21 Peace Street, Providence, RI, 02907.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations? I listen while traveling to work. Roads listed above.

How often do you listen at the above locations and traveling on the routes given above? For the Providence locations, we listen 5 days a week...traveling to work Monday-Friday. We also listen on the weekends in Fall River.

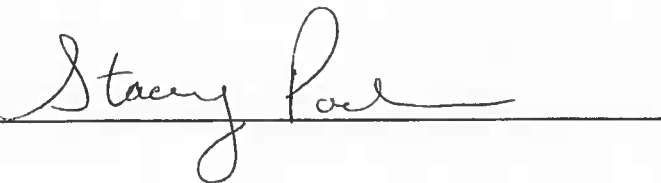
Do you personally know any one that works at the radio station? If yes what is your relationship to them? No.

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above? Sure.

What is your preferred contact method? Please give Mail, email or phone contact information. Email spacheco@gpymca.org or phone (774) 319-0737

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven, MA and the above information is correct to the best of my knowledge.

Signed: _____



FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

Amy Vieira 401-316-6084

54 Michael Dr. Bristol RI 02809

Where do you listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

On the way to work at Rhode Island Hospital 543 Eddy Street, Providence RI
I listen on 195 East and West into Providence and Home to Bristol, RI.
Also on 95 North and South to Eddy Street

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations?

As mentioned above, I listen to and from work on Eddy Street in Providence and traveling through R.I. Various hours

How often do you listen at the above locations and traveling on the routes given above?

4 days a week at those Providence RI locations

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

NO

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

Yes

What is your preferred contact method? Please give Mail, email or phone contact information.

Email Avieira10987@gmail.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven, MA and the above information is correct to the best of my knowledge.

Signed:

Amy Vieira

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information: Wendy D'Abrosca, 16 Plymouth Blvd, Westport, MA 02790 (508) 496-6656

Where do you Listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible. I listen at home and at work, and on the way to and from work at Lifespan at 225 Carolina Ave, Providence right near the wind turbines.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations? From home to work 195 and 95 (both ways each day). I take the Thurbers Ave exit. Fun 107 is part of my morning and afternoon commute each day.

How often do you listen at the above locations and traveling on the routes given above? Monday-Friday 5 times a week.

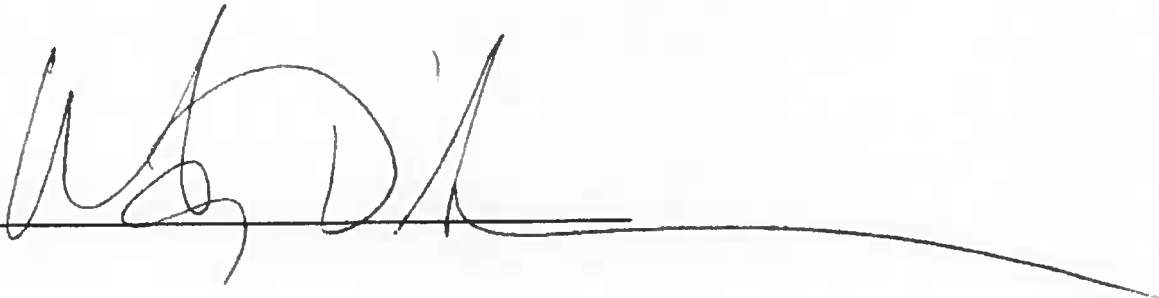
Do you personally know any one that works at the radio station? If yes what is your relationship to them? No

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above? Absolutely.

What is your preferred contact method? Please give Mail, email or phone contact information. Phone (508) 496-6656

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven ,MA and the above information is correct to the best of my knowledge.

Signed: _____

A handwritten signature in dark ink, appearing to read 'Wendy D'Abrosca', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

Jessica Ring 45 Anne Lane
Tiverton, RI 02878 401-439-1262

Where do you listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

In the car; at home (listed above) to work on 195 east + west
to 593 Eddy St. Providence RI. and on 95 south and north to RIH.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations?

mostly traveling to work. From Tiverton to Providence.
mostly on Rt 24 and 195. east and west to and from 593 Eddy
St Providence RI.

How often do you listen at the above locations and traveling on the routes given above?

Daily, various hrs at those Providence locations listed above

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

NO

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

yes

What is your preferred contact method? Please give Mail, email or phone contact information.

Email: jessrn7@gmail.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven, MA and the above information is correct to the best of my knowledge.

Signed: Jessica Ring

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact Information:

Jacqueline Turmenne 401-450-2307 32 Adelaide^{AVL} Barrington RI. 02806

Where do you listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

3-4 times per week. I listen on way to work located at 593 Eddy St. Providence RI on 195 East and West.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations?

As mentioned above, I listen to and from work as well as traveling through Rhode Island on routes such as 195 and 95 at various hours.

How often do you listen at the above locations and traveling on the routes given above?

3-4 times a week at Providence R.I. locations

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

No

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

Yes

What is your preferred contact method? Please give Mail, email or phone contact information.

turmenne@gmail.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven ,MA and the above information is correct to the best of my knowledge.

Signed:

Jacqueline Turmenne

FUN107 (WFHN) broadcasting on 107.1 MHz from Fairhaven, Massachusetts has learned that another new radio station may be going on the air on that same Frequency or Channel 107.1MHz and will make it difficult for some of FUN107 Listeners to continue to receive the station in the West Warwick, Apponaug, Warwick and the surrounding areas. In order for FUN107 to notify the FCC that there are regular listeners in these areas and ask that this new proposed station change to a different frequency FUN107 needs proof of listenership. If you are a listener please fill out all the information that applies below.

Fun 107 Listener Questionnaire

Full name and Contact information:

MJ Vassal 508-496-1423 110 Prospect St. Dartmouth. MA. 02748

Where do you listen to FUN107 (WFHN 107.1MHz)? List all locations such as Home, Work or at a friend's house. Give the addresses of those locations if possible.

Approximately 4 times a week as well as when traveling to R.I. on other occasions.
Travel times consist of 4 times on 195 East and West to and from work @ 2 Dudley Street
Providence. RI. Also on 95 North and South to Dudley Street.

Do you listen while traveling to and from work or just traveling about? On what roads do you listen while traveling? For example driving between what two locations?

As listed above at 6am and 3:30 pm.

How often do you listen at the above locations and traveling on the routes given above?

4 times week

Do you personally know any one that works at the radio station? If yes what is your relationship to them?

No

Would you allow a regulatory agency such as the FCC (Federal Communications Commission) to contact you to confirm information given above?

Yes

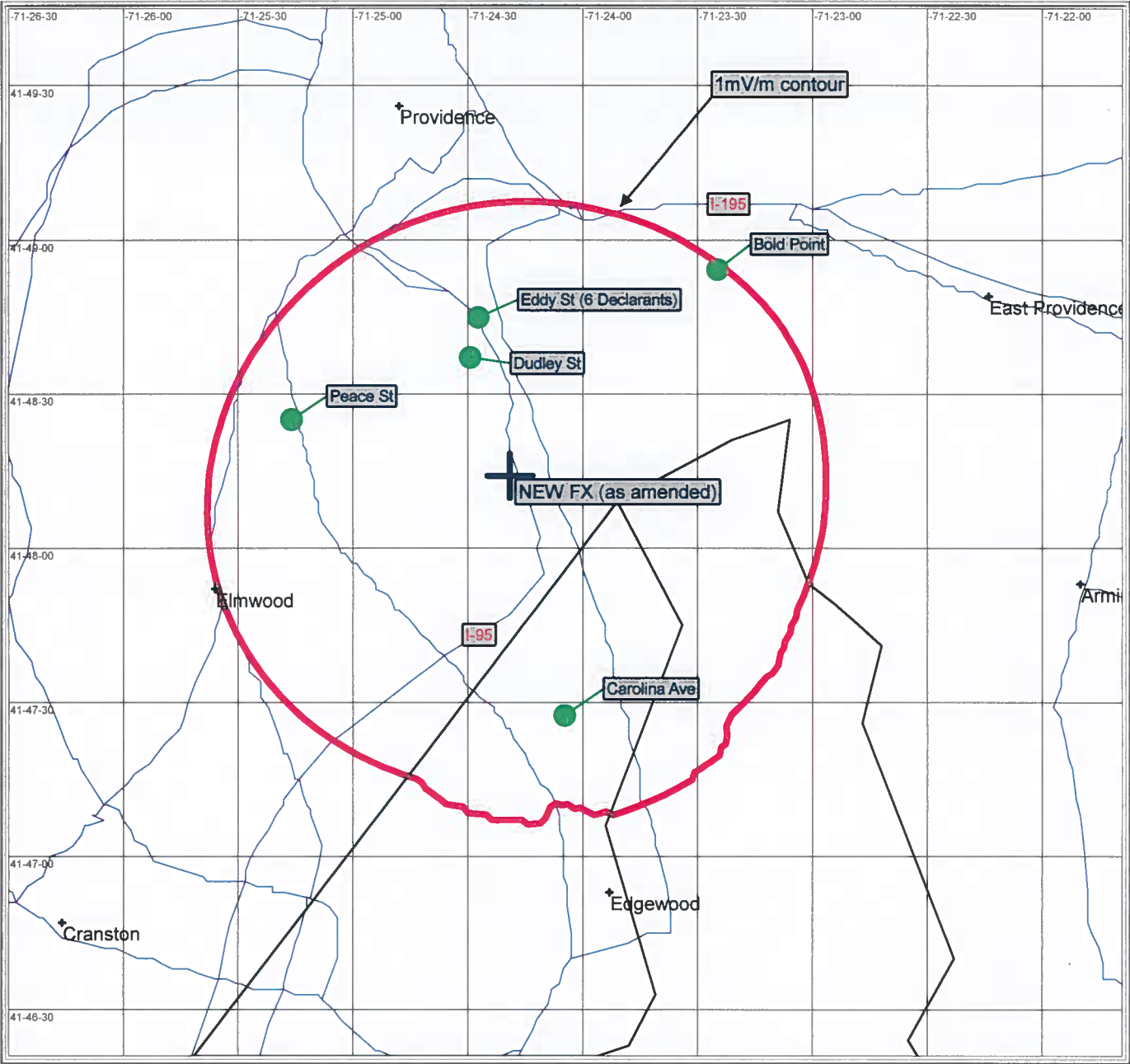
What is your preferred contact method? Please give Mail, email or phone contact information.

Email MJVassal@yahoo.com

I the undersigned am a listener of WFHN (FUN107) Located in Fairhaven, MA and the above information is correct to the best of my knowledge.

Signed: MJ Vassal

BNPFT-20181012AAS Amended 1mV/m (60dBu 50,50) Contour



WFHN listener locations depicted by markers in green

State Borders Highways Lat/Lon Grid

Map Scale: 1:35000 1 cm = 0.35 km VJH Size: 6.13 x 6.50 km

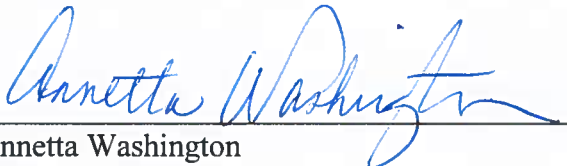
Created on behalf of Townsquare Media New Bedford License, LLC

CERTIFICATE OF SERVICE

I, Annetta Washington, a legal secretary with the law firm of Wilkinson Barker Knauer, LLP, hereby certify that on this 6th day of December, 2018, I served copies of the foregoing “**Reply to Opposition and Opposition to Amendment**” on the following via first-class United States mail, postage prepaid:

Susan A. Marshall
Anne Goodwin Crump
Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Arlington, VA 22209

By e-mail: audiodivisionpleadings@fcc.gov



Annetta Washington